IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA ROCK HILL DIVISION

James Neal Franklin,	Case No.: 0:24-cv-03181-SAL
Plaintiffs,	
v.)	
)	PLAINTIFF'S EXPERT DISCLOSURE
Don Ray Reynolds and Englander	
Transportation, Inc.,	
Defendants.)	

Plaintiff, James Neal Franklin, hereby submits his expert disclosure as required by Federal Rule of Civil Procedure 26(a) and the Court's Case Management and Scheduling Order. Plaintiff discloses the following expert witnesses who are reasonably expected to be called to offer opinions and testify at trial:

1. Mark Frisk, M.D.

Beaches Open MRI 350 10th Avenue South Jacksonville Beach, Florida 32250

Dr. Frisk is a retained expert who is expected to testify on behalf of the Plaintiff regarding his interpretations of Plaintiff's diagnostic studies and will provide opinions on causation, diagnoses, prognosis, impairment, permanency, disability and aggravation of any preexisting conditions within a reasonable degree of medical probability/certainty.

In addition, this physician, based upon his education, training and experience, based upon the history obtained, based upon the medical records reviewed, and based upon the diagnostic studies reviewed, will testify that the trauma sustained by Plaintiff in the subject motor vehicle crash caused injuries which are permanent in nature.

Plaintiff has not yet received Dr. Frisk's report. Plaintiff will supplement immediately upon receipt. Undersigned counsel attempted to contact Defendants' counsel to enter a stipulation regarding Dr. Frisk's report upon learning the report is not yet available but was unable to do so prior to the deadline. Plaintiff will stipulate to an extension of Defendants' deadline to disclose experts by the same number of days required by Plaintiff to provide Dr. Frisk's report.

2. Paul K. White, MD CLCP

Life Care Plans, MD 171 Huntington Road Atlanta, GA 30309

Dr. White was retained by Plaintiff to prepare a life care plan for Plaintiff's future medical needs and medical expenses resulting from the injuries sustained in the subject collision. Dr. White will offer opinions within a reasonable degree of medical probability on the Plaintiff's future medical needs and the reasonable costs of the same.

Reports from this expert with the contents required by Fed. R. Civ. P. 26(a)(2)(B) were provided to Defendants and their counsel on December 12, 2024.

Plaintiff reserves the right to elicit expert testimony from individuals named as experts by other parties or treating physicians and medical care providers to this case. Plaintiff further reserves the right to supplement this disclosure later should the case develop in such a way to warrant additional expert testimony on Plaintiff's behalf.

[Signature on Following Page]

Respectfully submitted,

MORGAN & MORGAN, P.A.

<u>/s/ Cooper Klaasmeyer</u> COOPER KLAASMEYR, ESQ.

SC BAR NO.: 105795 Federal ID: 14272

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Attorneys for the Plaintiff

February 12, 2025 North Charleston, SC